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October 6, 2021

Via CM/ECF

The Hon. Sharon M. King, U.S.M.J.
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets
Camden, NJ 08001

re: Jane Doe, o/b/o her minor child, John Doe v. Marty Small, Jr., et al.
Docket No.: 1:21-cv-11189-JHR-SAK
Table of Contents and Table of Authorities to Supplement Plaintiff's
Opposition to Pending 12(b)(6) Motions

Dear Judge King:

This office represents the Plaintiff, Jane Doe, on behalf of John Doe, her minor son, in the above-captioned matter. The undersigned recently a Notice of Appearance for such representation. Due to the recency of the undersigned's entry, Plaintiff's Opposition to two pending motions to dismiss for failure to state a claim was timely filed, but it did not include a table of contents and table of authorities as part of the opposition brief.

Please let the attached Table of Contents and Table of Authorities serve as a supplement and amendment to Plaintiff's October 4, 2021 opposition filing, along with a Certification of Service for the said supplement. This office respectfully requests that the Court consider Plaintiff's Opposition on the merits notwithstanding the admitted procedural defect.

Thank you for the Court's attention to this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "John A. Fonte". The signature is stylized with a large, looped "J" and a distinct "F".

John A. Fonte, Esquire

JAF/
Enclosures

cc:
Benjamin H. Zieman, Esq. (*via CM/ECF only*)
Jeffrey L. Shanaberger, Esq. (*via CM/ECF only*)

TABLE OF CONTENTS

I.	PRELIMINARY STATEMENT	1
II.	STATEMENT OF FACTS.....	2
III.	STANDARD OF REVIEW.....	2
IV.	LEGAL ARGUMENT.....	4
A.	PLAINTIFF HAS SUFFICIENTLY PLEADED FACTS THAT ESTABLISH A FAILURE TO INTERVENE CLAIM (COUNT II) AND FAILURE TO TRAIN & SUPERVISE CLAIM (COUNT III) AGAINST DEFENDANT LA'QUETTA SMALL, IN VIOLATION OF 42 U.S.C. § 1983.....	5
1.	Defendant Small's Liability in her Official Capacity under § 1983....	7
2.	Defendant Small's Liability in her Individual/Personal Capacity under § 1983 Based upon a Legal Theory of Failure to Investigate and Intervene.....	8
3.	Defendant Small's Liability in her Individual/Personal Capacity under § 1983 Based upon a Legal Theory of Failure to Supervise and Train.....	9
4.	Defendant Small's Liability in her Individual/Personal Capacity under § 1983 Based upon a Legal Theory of State-Created Danger...	11
B.	PLAINTIFF HAS SUFFICIENTLY PLEADED FACTS THAT SUPPORT EACH ELEMENT OF NEGLIGENCE (COUNT V) AND GROSS NEGLIGENCE / RECKLESSNESS (COUNT VI) AGAINST DEFENDANT LA'QUETTA SMALL.....	12
C.	PLAINTIFF HAS SUFFICIENTLY PLEADED FACTS THAT ESTABLISH THAT DEFENDANT LA'QUETTA SMALL'S ACTIONS RESULTED IN AN INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS (COUNT VIII) UPON PLAINTIFF'S MINOR CHILD.....	13
D.	PLAINTIFF HAS SUFFICIENTLY PLEADED FACTS THAT ESTABLISH A VIOLATION OF THE CHILD SEXUAL ABUSE ACT (COUNT IX) AGAINST DEFENDANT LA'QUETTA SMALL.....	14
E.	DEFENDANT LA'QUETTA SMALL IS NOT ENTITLED TO QUALIFIED IMMUNITY AGAINST THE CLAIMS ASSERTED AGAINST HER IN THE AMENDED COMPLAINT.....	16

F.	MAINTAINING THE AVAILABILITY OF PUNITIVE DAMAGES AGAINST DEFENDANT SMALL IS PROPER UNDER THE LAW.....	16
G.	PLAINTIFF SHOULD BE GIVEN LEAVE TO AMEND ANY AND ALL CLAIMS ASSERTED IN THE AMENDED COMPLAINT THAT THIS COURT IS INCLINED TO DISMISS UNDER FED. R. CIV. P. 12(b)(6)....	17
V.	CONCLUSION.....	17

TABLE OF AUTHORITIES**CASES**

<i>Baker v. McCollan</i> , 443 U.S. 137 (1979)	6
<i>Bayer v. Twp. of Union</i> , 414 N.J. Super. 239 (N.J. Super. Ct. App. Div. 2010)	6, 16
<i>Bell Atl. Corp. v. Twombly</i> , 550 U.S. 544, 127 S.Ct. 1955 (2007)	2, 3, 9
<i>Berry v. Leslie</i> , 767 F.3d 1144 (11th Cir. 2014)	9
<i>Bonenberger v. Plymouth Twp.</i> , 132 F.3d 20 (3d Cir. 1997)	9, 10
<i>Caltavuturo v. City of Passaic</i> , 307 A.2d 114 (N.J. Super. Ct. App. Div. 1973)	12
<i>City of Newport v. Fact Concerts, Inc.</i> , 453 U.S. 247 (1981)	16
<i>Connelly v. Lane Constr. Corp.</i> , 809 F.3d 780 (3d Cir. 2016)	3
<i>Connick v. Myers</i> , 461 U.S. 138 (1983)	6
<i>Darr v. Wolfe</i> , 767 F.2d 79 (3d Cir. 1985)	3
<i>Decker v. Princeton Packet</i> , 116 N.J. 418, 561 A.2d 1122 (N.J. 1989)	14
<i>District Council 47 v. Bradley</i> , 795 F.2d 310 (3d Cir. 1986)	4
<i>Glenside W. Corp. v. Exxon Co., U.S.A.</i> , 761 F.Supp. 1100 (D.N.J. 1991)	2
<i>Gutman v. Howard Savings Bank</i> , 749 F.Supp. 254 (D.N.J. 1990)	3
<i>Hafer v. Melo</i> , 502 U.S. 21 (1991)	7, 8, 16
<i>Harlow v. Fitzgerald</i> , 457 U.S. 800 (1982)	16
<i>Henry v. City of Erie</i> , 728 F.3d 275 (3d Cir. 2013)	11
<i>Imbler v. Pachtman</i> , 424 U.S. 409, 96 S.Ct. 984 (1976)	16
<i>In re Burlington Factory Sec. Litig.</i> , 114 F.3d 1410 (3d Cir. 1997)	3, 4
<i>Janowski v. City of Wildwood</i> , 259 F. Supp. 3d 113 (D.N.J. 2017)	8
<i>Jenkins v. Anderson</i> , 922 A.2d 1279 (N.J. 2007)	12

<i>Jersey Central Power & Light Co. v. Melcar Util. Co.</i> , 212 N.J. 576 (N.J. 2013).....	12
<i>Monell v. Dep’t of Soc. Servs.</i> , 436 U.S. 658 (1978).....	6
<i>Morse v. Lower Merion School Dist.</i> , 132 F.3d 902 (3d Cir. 1997).....	6
<i>Pfenninger v. Hunterdon Central</i> , 167 N.J. 230 (N.J. 2001).....	12
<i>Pickering v. Bd. of Educ.</i> , 391 U.S. 563 (1968).....	6
<i>Rivkin v. Dover Twp. Rent Leveling Bd.</i> , 143 N.J. 352 (1996).....	6
<i>Sample v. Diecks</i> , 885 F.2d 1099 (3d Cir. 1989).....	9
<i>Scheuer v. Rhodes</i> , 416 U.S. 232, 94 S.Ct. 1683 (1974)	3
<i>Shane v. Fauver</i> , 213 F.3d 113 (3d Cir. 2000)	4
<i>Sheridan v. NGK Metals Corp.</i> , 609 F.3d 239 (3d Cir. 2010)	2
<i>Soliman v. Kushner Cos., Inc.</i> , 433 N.J. Super. 153 (N.J. Super. Ct. App. Div. 2013)....	13
<i>Watts v. Internal Rev. Serv.</i> , 925 F.Supp. 271 (D.N.J. 1996)	3
<i>Wildoner v. Borough of Ramsey</i> , 162 N.J. 375 (N.J. 2000).....	6

STATUTES

42 U.S.C. § 1983.....	<i>en passim</i>
N.J.S.A. § 2A:16B-1	5, 14

RULES

Fed. R. Civ. P. 12(b)(6).....	<i>en passim</i>
Fed. R. Civ. P. 15(a)	3

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Attorneys for Plaintiff, JANE DOE, on behalf of JOHN DOE, her minor child

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

JANE DOE, on behalf of JOHN DOE, her
minor child,

Plaintiff,

v.

MARTY SMALL, SR., in his official
capacity as Mayor of Atlantic City, New
Jersey, and individually,

LA'QUETTA SMALL-FRAZIER, in
her official capacity as Former Principal
of Pennsylvania Avenue School, and
individually,

BARRY CALDWELL, in his official
capacity as current Superintendent of
the Atlantic City School District,

PAUL A. SPAVENTA, in his official
capacity as former Interim
Superintendent of the Atlantic City School
District,

ATLANTIC CITY BOARD OF
EDUCATION, a public entity, and

KAYAN AHMED FRAZIER, an
individual,

Defendants.

Hon. Joseph H. Rodriguez, U.S.D.J.
Hon Sharon A. King, U.S.M.J.

Docket No. 1:21-cv-11189-JHR-SAK

CIVIL ACTION

DOCUMENT FILED ELECTRONICALLY

CERTIFICATION OF SERVICE

I, John A. Fonte, Esq., the attorney for Plaintiff, Jane Doe, on behalf of John Doe, her minor child, in this action, hereby certify that on the date hereunder, I served upon the following individuals a copy of the Table of Contents and Table of Authorities for Plaintiff's previously submitted Opposition to the Motion of La'Quetta Small to Dismiss the Amended Complaint for Failure to State a Claim, and to the Motion of Atlantic City Board of Education, Paul A. Spaventa, and Barry Caldwell to Dismiss the Amended Complaint for Failure to State a Claim, along with all supporting documents, via District of New Jersey's CM/ECF system:

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October 6, 2021
Date


John A. Fonte, Esq.